

From: EMER Lydia
To: [Lidgard, Michael](#)
Cc: [Burgess, Karen](#); [Opalski, Dan](#); doughten.ron@deq.state.or.us
Subject: Oregon DEQ Comments on Draft PQR Report
Date: Monday, February 22, 2016 4:32:36 PM
Attachments: [Oregon Draft PQR Report 01-22-16.docx](#)

Dear Mr. Lidgard:

Thank you for the opportunity to provide comments on the draft report on the Permit Quality Review (PQR) of Oregon's Department of Environmental Quality (DEQ) National Pollutant Discharge Elimination System (NPDES) Program. We appreciate the time you and the PQR team spent reviewing our permit program. Identifying and addressing deficiencies or noncompliance with federal regulations will be a priority for Oregon's NPDES program. Furthermore, we appreciate your identifying additional recommendations and suggestions for program improvement. Our comments on the draft report have been included in the attached document.

DEQ also appreciates EPA's offer of assistance in addressing other areas of significant concern, including permit backlog, permit and permit evaluation report quality, and program consistency among DEQ's offices. DEQ and EPA share a common goal to improve Oregon's NPDES permit program and we look forward to working with you to improve the DEQ's program performance in each of these areas.

Specifically with respect to permit backlog, DEQ recognizes value in working closely with you and EPA Region 10 staff to identify opportunities and specific actions to reduce Oregon's NPDES permit backlog. We would appreciate meeting with you to clarify how we can best work together towards our common objective to improve our NPDES program. Ron Doughten or I will contact you to initiate more in depth conversations about reducing permit backlog and related matters.

In addition, DEQ has contracted with a third party consultant, MWH Americas, Inc., to review's DEQ's NPDES program and provide recommendations for issuing environmentally relevant permits in a timely manner, with the goal of reducing permit backlog to EPA's target of ten percent or less. MWH will reach out to individual stakeholders during Phase I of the project. With your agreement, DEQ intends to recommend MWH contact EPA Region 10 directly for specific information on Oregon's NPDES program. If you agree to work with MWH, please provide DEQ with a primary EPA Region 10 contact and contact information that we can share with the consultant.

If you have questions about DEQ's comments on the draft PQR report, the third party consultant, or other opportunities to improve Oregon's NPDES program, please contact me at 503-229-6411 or you may contact Ron Doughten at 503-229-5589.

Thanks,

Lydia Emer

Did you know?

DEQ's Cleanup program includes a Brownfields sub-program to facilitate cleanup of contaminated or

underutilized properties for future redevelopment. By some estimates, Oregon has over 13,000 brownfield sites, ranging from large abandoned mills and industrial lands to former gas stations and dry cleaners. Over the past few years, the Cleanup program has partnered with landowners and other organizations to identify, remediate, and assist in reuse planning at hundreds of brownfields to improve the environmental and economic health of communities throughout our state.

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